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IN THE UNITED STATE DISTRICT
COURT OF NEVADA

STEVE COBURN,

Case No.: 2:23-cv-00162-GMN-BNW

Plaintiff,

v.

[PROPOSED] STIPULATED
DISCOVERY PLAN AND SCHEDULING
ORDER SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)

COUNTY OF CLARK,

Defendants.

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Under Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(b) and (e), Plaintiff Steve Coburn, ("Plaintiff"), Defendant County of Clark submit the following Stipulated Discovery Plan and Scheduling Order.

1. Early Case Conference and Initial Disclosures

The parties agree that pursuant to Local Rule 26-1 the parties should exchange their respective Initial Disclosures within 30 days (Friday, April 14, 2023) of the date of the 26(f) conference held on March 15, 2023.

2. The Subjects On Which Discovery Will Be Conducted

The parties will conduct discovery on the following:

All issues raised in the Complaint and Answer.

3. Electronically Stored Information

The parties agree that, to the extent feasible, electronically stored information will be produced as hard copies and/or PDF files in an electronic format.

1 4. Claims of Privilege or Protection

2 At this time, the parties do not anticipate any issues regarding claims of privilege or
3 protection, but reserve the right to assert any such claims.

4 5. Limitations On Discovery

5 The parties agree that discovery will be conducted in accordance with the Federal Rules of
6 Civil Procedure and applicable Local Rules without limitation or modification of the same.

7 6. Discovery Deadline

8 Discovery shall close on Monday, August 21, 2023, which is 180 days from the date of
9 Defendant's Answer filed on February 22, 2023.

10 7. Amending the Pleadings and Adding Parties

11 The deadline to file motions to amend the pleadings or add parties shall be Tuesday, May 23,
12 2023, ninety (90) days prior to the close of discovery.

13 8. Expert Disclosures

14 In accordance with Fed. R. Civ. P. 26(a)(2)(B), disclosures identifying experts shall be made
15 sixty (60) days prior to the discovery cut-off date and no later than Thursday, June 22, 2023.
16 Disclosures identifying rebuttal experts shall be made thirty-two (32) days after the disclosure of
17 experts and no later than Monday, July 24, 2023.

18 9. Dispositive Motions

19 The filing deadline for dispositive motions shall be Wednesday, September 20, 2023, thirty
20 (30) days after the close of discovery.

21 10. Pretrial Order

22 The Joint Pretrial Order shall be filed by Friday, October 20, 2023, thirty (30) days after the
23 date set for the filing of dispositive motions. However, in the event that dispositive motions are filed,
24 the date for filing the joint pretrial order shall be suspended until 30 days after the Court issues its
25 decision on any dispositive motions or further order of the Court. The disclosures required by
26 Fed.R.Civ.P. 26(a)(3) and any objections thereto, shall be included in Joint Pretrial Order.

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11. Extensions or Modifications of the Discovery Plan and Scheduling Order

Applications to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR 6-1, be supported by a showing of good cause for the extension. In accordance with LR 26-3, all motions or stipulations to extend a deadline set forth in a discovery plan shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline. A request made after the expiration of the subject deadline shall not be granted unless the movant demonstrates that the failure to act was the result of excusable neglect. Any motion or stipulation to extend a deadline or to reopen discovery shall include:

- (a) A statement specifying the discovery completed;
- (b) A specific description of the discovery that remains to be completed;
- (c) The reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan; and
- (d) A proposed schedule for completing all remaining discovery.

It is not good cause for a later request to extend discovery that the parties informally postponed discovery. No stipulations are effective until approved by the Court. See LR 7-1(b).

12. Alternative Dispute Resolution

The parties certify they have met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and ENE. An ENE is currently scheduled for May 4, 2023.

13. Alternative Forms of Case Disposition

The parties certify they have considered consent to trial by a magistrate judge under 28 U.S.C. 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

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14. Electronic Evidence

The parties verify they have discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations. Discussions between the parties will be ongoing as the trial date approaches and they stipulate that they intend to present any electronic evidence in a format compatible with the Court's electronic jury evidence display system.

IT IS SO STIPULATED.

DATED this 16th day of March, 2023.

LAW OFFICE OF DANIEL MARKS

/s/ Daniel Marks

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DATED this 16th day of March, 2023.

DISTRICT ATTORNEY, CIVIL DIVISION

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IT IS SO ORDERED.


UNITED STATES JUDGE

DATED this 17th day of March, 2023.